

OSBORN LAW P.C.

Daniel A. Osborn, Esq.
Lindsay M. Trust, Esq.

43 West 43rd Street, Suite 131
New York, New York 10036
Phone: 212-725-9800
Facsimile: 212-500-5115

Email: info@osbornlawpc.com
www.osbornlawpc.com

August 19, 2021

VIA ECF

Honorable Debra Freeman
United States Magistrate Judge
Daniel Patrick Moynihan Courthouse
500 Pearl Street
New York, New York 10007

Re: *Rosado v. Commissioner of Social Security*,
Civil Action No. 1:21-cv-01280-GBD-DCF

Dear Judge Freeman,

We write on behalf of plaintiff, Charlie Rosado, and with the consent of the defendant, to request a 60-day extension of time to file plaintiff's motion for judgment on the pleadings. Plaintiff's motion is due on August 23, 2021. Plaintiff respectfully requests an extension of time up to and including October 21, 2021. This is plaintiff's first request for an extension.

The additional time is necessary because our office has numerous closely scheduled (and overlapping) deadlines in social security matters. For several months we received countless requests from the Agency for additional time to serve administrative records because of delays the Agency was encountering in getting records prepared. We believe that the Agency has mostly emerged from this backlog, but it has had the unintended effect of creating a backlog on our end. For example, our office has over twenty briefs due between August 23, 2021, and September 3, 2021.

Subject to the approval of the Court, the parties propose the following revised briefing schedule of the Court's February 16, 2021 Scheduling Order:

Honorable Debra Freeman
August 19, 2021
Page 2

- a. Plaintiff to serve his motion for judgment on the pleadings on or before **October 21, 2021**;
- b. Defendant to serve its response/cross-motion on or before **December 21, 2021**; and
- c. Plaintiff to serve his reply (if any) on or before **January 11, 2021**.

Thank you for your consideration of this request.

Respectfully submitted,

s/Daniel A. Osborn
Daniel A. Osborn
OSBORN LAW, P.C.
43 West 43rd Street, Suite 131
New York, New York 10036
Telephone: 212-725-9800
Facsimile: 212-500-5115
dosborn@osbornlawpc.com

cc: Joseph Pantoja, Esq. (by ECF)

The proposed schedule is adopted.

SO ORDERED


DEBRA FREEMAN
United States Magistrate Judge

Dated: 9/27/2021
(*nunc pro tunc* to 8/23/2021)